

From: [Wilwerding, Joseph](#)
To: [Kelly Johnson](#); [Hammond, Lauren](#)
Cc: [Escobar, Carlos](#); [Lang, Jeffrey](#); [Marie Durrant](#); [Brown, Tim](#)
Subject: RE: Request for Extension -- 2016 CAA 114(a) Request for Information
Date: Monday, March 7, 2016 8:40:07 AM
Attachments: [image001.gif](#)

Hi Kelly, we're putting together the formal extension letter, and I noticed #11 from the 2016 request may have gotten lost in the shuffle. We've put this down for extension until May 2, just FYI.

Thanks,

Joe

Request #11 (Provide, in electronic format (Excel or other comma delimited format), for each individual calciner, from 1995 to present, the monthly average wet and dry volume of process gas vented from each calciner to the atmosphere)

Joseph L. Wilwerding

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(303) 312-6729, wilwerding.joseph@epa.gov

From: Kelly Johnson [<mailto:KAJohnson@hollandhart.com>]

Sent: Thursday, March 03, 2016 3:22 PM

To: Wilwerding, Joseph ; Hammond, Lauren

Cc: Escobar, Carlos ; Lang, Jeffrey ; Marie Durrant ; Brown, Tim

Subject: RE: Request for Extension -- 2016 CAA 114(a) Request for Information

Joe – My apologies for the delayed response. Yes, we will get you information on the coal fired boilers by May 2, 2016. Kelly

From: Wilwerding, Joseph [<mailto:Wilwerding.Joseph@epa.gov>]

Sent: Wednesday, March 02, 2016 2:52 PM

To: Kelly Johnson; Hammond, Lauren

Cc: Escobar, Carlos; Lang, Jeffrey; Marie Durrant; Brown, Tim

Subject: RE: Request for Extension -- 2016 CAA 114(a) Request for Information

Kelly, thank you for your email and the first-phase 114 response information forwarded earlier today. On the below schedule, can you please indicate Solvay's update to Request Numbers 4 and 5 from the 2014 Request, including information on coal fired boilers (in addition to calciners) in Request 5, will be provided by May 2, 2016?

The remaining schedule looks accurate. We will follow up with a formal letter to capture the agreed-to changes in schedule.

Thank you and best regards,

Joe

Joseph L. Wilwerding

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From: Kelly Johnson [<mailto:KAJohnson@hollandhart.com>]

Sent: Wednesday, March 02, 2016 2:38 PM

To: Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>; Hammond, Lauren <Hammond.Lauren@epa.gov>

Cc: Escobar, Carlos <carlos.escobar@solvay.com>; Lang, Jeffrey <jeffrey.lang@solvay.com>; Marie Durrant <MBDurrant@hollandhart.com>; Brown, Tim <tim.brown@solvay.com>

Subject: RE: Request for Extension -- 2016 CAA 114(a) Request for Information

Joe -

Thank you for your consideration of Solvay's request for a phased response of documents responsive to EPA's 2016 Request under Section 114(a) of the Clean Air Act. Solvay will make a good faith effort to meet the deadlines you have proposed. In particular:

April 1, 2016 Request #2 (expansion narrative)

Request # 7 (summary pages of backup reports for other pollutant emissions from calciners)

Request #8 (Reference Method Value)

May 2, 2016 Request #6 (backup reports for VOC/HAPs emissions from calciners)

Request # 1 for 2014 Gas Boiler Addition
(information responsive to 2014 Requests
No. 3, No.4, No. 5, No. 6, No. 7, and No. 11,
including NOx and CO stack tests)

Request #1 for Gas Efficiency Project

Request #1 for CA-2 Bucket Elevator

Request #1 for Calciner Conversion to Coal

Request #1 / #4 for Star Strike 2

With respect to Request #8, Solvay will do its best to provide the values used to arrive at the emissions numbers provided in response to 2014 Request No. 10 h). However, after extensive searching, which included not only a review of potentially responsive documents at the Facility but also the hard drive for the former environmental manager, Solvay has not been able to find all of the backup documentation with the actual calculations for a significant period of time in the 1990s and early-mid 2000s. For more recent years, Solvay has the backup calculations and will be able to provide the values used for purpose of the emissions inventory. We appreciate EPA's desire to have as much information as possible for the emissions data and will provide all that we have been able to retrieve. Solvay does note that the fees paid to the WYDEQ are based on the emissions inventory (the source of the emissions numbers provided in response to 2014 Request No. 10 h)) so it has confidence in the numbers it has provided to EPA (and previously provided to WYDEQ). Please let me know if you have questions.

Kelly

From: Wilwerding, Joseph [<mailto:Wilwerding.Joseph@epa.gov>]

Sent: Tuesday, March 01, 2016 12:15 PM

To: Kelly Johnson; Hammond, Lauren

Cc: Escobar, Carlos; Lang, Jeffrey; Marie Durrant

Subject: RE: Request for Extension -- 2016 CAA 114(a) Request for Information

Hi Kelly, I'm just back yesterday and had a chance to confer with Lauren about your email. Please see my comments below in red. Your general request for an extension and phased approach to the responses is acceptable, provided Solvay can meet the below conditions:

- We would like for the entire response to be completed within 90 days (early May) as opposed to your proposed 120 days (early June), so that we can continue with important aspects of the evaluation.
- We would like Solvay to update its Responses to the 2014 Request for Request Numbers 4 and 5, and to include the coal fired boilers in Request 5 (with the calciners).

If these changes are acceptable, we will issue a letter to Solvay formalizing the new schedule. Please let us know as soon as possible.

Thank you,

Joe

Joseph L. Wilwerding

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From: Kelly Johnson [<mailto:KAJohnson@hollandhart.com>]

Sent: Wednesday, February 24, 2016 11:58 AM

To: Hammond, Lauren <Hammond.Lauren@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>

Cc: Escobar, Carlos <carlos.escobar@solvay.com>; Lang, Jeffrey <jeffrey.lang@solvay.com>; Marie Durrant <MBDurrant@hollandhart.com>

Subject: Request for Extension -- 2016 CAA 114(a) Request for Information

Joe / Lauren –

On behalf of Solvay Chemicals Inc. ("Solvay"), thank you for taking the time on Monday to discuss Solvay's response to the follow-up section 114(a) request dated January 25, 2016 ("2016 Request"), which Solvay received on February 1, 2016. Solvay is in the process of gathering responsive documents and information, but it will be impossible for Solvay to provide a complete response to this broad request within 30 days, or March 2, 2016, as EPA requests. As we discussed, this email memorializes our discussion and proposes a phased response to the 2016 Request.

1. Identified Capital Projects.

In the 2016 Request, EPA identifies 10 capital projects for which Solvay needs to provide documents responsive to Requests No. 6 and No. 7 from the Clean Air Act 114(a) Request sent to Solvay on April 28, 2014 ("2014 Request"). A few points of clarification:

- (b) (4)

In addition, three of the identified capital projects, while separately listed, are actually the same project (Upgrade Calciner Discharge / Upgrade CA-1 Discharge / CA-1 Bucket Elevator).

- Even though the 2014 Request only asked about coal fired boilers, the 2016 Request asks for information related to the 2014 Gas Boiler Addition Project. With respect to the 2014 Gas Boiler Addition Project, EPA would

like Solvay to provide the following information from the 2014 Request: Requests No. 3, No.4, No. 5, No. 6, No. 7, and No. 11 (EPA also requests results from any NOx and CO stack tests under Request No. 11).

- For the 2014 Request , Solvay provided the information for Request No. 6 a) in its response to 2014 Request No. 5. If any additional responsive information for 2014 Request No. 5 / Request No. 6 a) is discovered, Solvay will provide the documents in its response to the 2016 Request.
- As requested, Solvay will provide the documents responsive to the 2014 Request No. 6 b), 6 c), 6 d), 6 e), 6 f), in its response to 2016 Request.
- At this time, EPA has indicated that Solvay does not need to provide the documents responsive to Request No. 6 g) and 6 h).

2. Star Strike 2 Documents.

In its response to the 2014 Request Nos. 4 and 5, Solvay provided capital project information for the Star Strike 2 project. Solvay will provide the documents responsive to 2014 Request Nos. 6 and 7 in its response to the 2016 Request #1.

Timing of Production

Solvay is on schedule to provide documents responsive to the following 2016 Requests by March 2, 2016:

- Request # 3 (1999 Construction Management Agreement)
- Request # 5 (Calcliner Operating Capacity)
- Request # 9 (Estimation of Feed for Jan. 1995 – Dec. 1997)

Solvay may also be able to provide information responsive to Request # 10 (Boiler results for CO, NOx and SO2). If Solvay cannot provide the documents responsive to Request #10 by March 2, it will do so shortly thereafter.

With respect to the other information requests, Solvay will need to produce thousands of pages of documents. In particular, Solvay anticipates that hundreds of pages will be produced in response to the 2016 Requests #1 and #4 (this is the information originally requested by 2014 Request No. 6 a) – 6 f) and 2014 Request No. 7) for the five identified capital projects (CA-2 Bucket Elevator, Calcliner Conversion, Gas Efficiency, the Star Strike 2 Project, and the 2014 Gas Boiler Addition). In addition, the backup reports for the stack tests requested by 2016 Requests #6 and #7 average about 100 pages and there are approximately 75 of these backup reports, all in bound hard copy format. With the limited staffing at Solvay's Green River facility, finding (particularly for projects that were permitted and constructed over two decades ago) and then copying this volume of documents will be a slow process, even though Solvay has deployed additional resources to complete its response.

Because of these challenges, for the remaining 2016 Requests, Solvay proposes the following schedule:

April 1, 2016 Request #2 (expansion narrative)

Request #6 (backup reports) Can be by May 2.

Request # 7 (backup reports) Summary pages (usually 1-2 per stack test, instead of 100's of pages) including info on operating conditions, is fine for now.

May 2, 2016 Request # 1 for 2014 Gas Boiler Addition

Request #1 for Gas Efficiency Project

Request #1 for CA-2 Bucket Elevator

Request #8 (Reference Method Value)

In case language on Request 8 was not clear, this is what we need: For each of

Solvay's responses to Question 10.h. in which the explanation for how pollutant emissions were estimated included the response "Reference Method", "Operating Hours", or "lb/ton VOC", provide the "Reference Method", "Operating Hours", or "lb/ton VOC" value used in the calculation.

As emissions data, this data is key to our evaluation. Move Request #6 above to here, and move Request #8 to April 1.

Move all June 1 deadline items to May 2.

June 1, 2016 Request #1 for Calcliner Conversion to Coal
Request #1 / #4 for Star Strike 2

Solvay appreciates that this schedule constitutes a multi-phase production of responsive documents. However, in order to accurately and completely respond to the 2016 Request, Solvay believes this additional time is necessary. I can assure you that Solvay is making a good faith effort to provide all responsive documents in a timely manner, but the scope of the undertaking is significant for the facility.

Thank you for your consideration of Solvay's request for a phased response timeline for the 2016 Request. I look forward to hearing from you about the proposed schedule for Solvay's response. I can be reached at (202) 654-6933.

Kelly

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